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Attorneys for Plaintiff
United States of America

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

LEONARDO RUIZ-AMADOR,

Defendant.

Case No: 1:25-CR-00061-KES-BAM

STIPULATION TO CONTINUE STATUS
CONFERENCE; ORDER

THE PARTIES HEREBY STIPULATE, through their respective attorneys of record, Assistant United States Attorney Brittany M. Gunter, counsel for the government, and Kara Ottervanger, counsel for Leonardo Ruiz-Amador (“defendant”), that this action’s **Wednesday, April 23, 2025, status conference be continued to Wednesday, May 28, 2025, at 1:00 p.m.** The parties likewise ask the court to endorse this stipulation by way of formal order.

The parties base this stipulation on good cause. Specifically,

1. The grand jury returned an indictment regarding this matter on March 27, 2025. Dkt. 9. The government prepared and delivered an initial set of discovery to defense counsel within the time limits set forth by Eastern District of California Local Rule 440. The defense is and has been reviewing discovery thus far provided.

2. The government will follow up with law enforcement to determine the extent additional supplemental discovery exists. If the government identifies additional information that should be produced as supplemental discovery, the government will promptly produce it to defense counsel in accord with Rule 16.
3. Defense counsel requires more time to complete her review of the discovery, complete any additional investigation, and discuss the case with the defendant. By the time of the continued status conference and as all discovery is obtained, produced, and timely reviewed, the parties further intend to explore the extent this case can be resolved prior to trial. Defense counsel needs additional time also to communicate with the defendant and the government about a potential pretrial resolution of this case.
4. Defense counsel believes that failure to grant the above-requested continuance would deny him the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.
5. The government does not object to the continuance.
6. The parties therefore stipulate that the period of time from April 23, 2025, through May 28, 2025, is excludable pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(i) and (iv) because it results from a continuance granted by the Court at the parties' request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

IT IS SO STIPULATED.

Dated: April 16, 2025

MICHELE BECKWITH
Acting United States Attorney

By: /s/ BRITTANY M. GUNTER
BRITTANY M. GUNTER
Assistant United States Attorney

Dated: April 16, 2025

By: /s/ KARA OTTERVANGER
KARA OTTERVANGER
Counsel for Defendant

ORDER

IT IS ORDERED that the status hearing currently set for April 23, 2025, at 1:00 pm is continued until May 28, 2025, at 1:00 pm. in Courtroom 8 (BAM) before Magistrate Judge Barbara A. McAuliffe.

IT IS FURTHER ORDERED THAT the period of time from April 23, 2025, through and including May 28, 2025, is excluded pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(i) and (iv) because it results from a continuance granted by the Court at the parties' request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

IT IS SO ORDERED.

Dated: April 16, 2025

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE